

JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

OWEN P. MARTIKAN (CSBN 177104)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7241
Facsimile: (415) 436-7234
owen.martikan@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR 08-0911 MHP
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXCLUDING TIME
v.)	
)	
DEON DOGAN,)	
)	
Defendant.)	
)	

On April 2, 2009, the parties in this case appeared before the Court for identification of counsel and a detention hearing. The parties stipulated and the Court agreed that time should be excluded from the Speedy Trial Act calculations from April 2, 2009, through April 6, 2009, for effective preparation of defense counsel. The parties represented that granting the continuance would allow the reasonable time necessary for effective preparation of defense counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of justice served by granting such a continuance outweighed the best

//

interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(8)(A).

SO STIPULATED:

JOSEPH P. RUSSONIELLO
United States Attorney

/s/

DATED: _____

OWEN P. MARTIKAN
Assistant United States Attorney

/s/

DATED: _____


RONALD C. TYLER
Attorney for Deon Dogan

~~PROPOSED~~ ORDER

As the Court found on April 2, 2009, and for the reasons stated above, an exclusion of time from April 2, 2009, through April 6, 2009, is warranted because the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. §3161 (h)(8)(A). The failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).

SO ORDERED.

DATED: 4/3/2009 _____


HON. BERNARD ZIMMERMAN
United States Magistrate Judge